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*Attorneys for Defendants* XINGKE ELECTRONICS

(DONGGUAN) CO., LTD., formerly known as

SINCO ELECTRONICS (DONGGUAN) CO.,

LTD., LIEW YEW SOON aka, MARK LIEW, NG

CHER YONG. aka CY NG, and MUI LIANG TJOA

aka ML TJOA

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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SINCO TECHNOLOGIES PTE LTD.,

Plaintiff,

vs.

SINCO ELECTRONICS (DONGGUAN) CO.,  
LTD.; XINGKE ELECTRONICS  
(DONGGUAN) CO., LTD.; XINGKE  
ELECTRONICS TECHNOLOGY CO., LTD.;  
SINCOO ELECTRONICS TECHNOLOGY CO.,  
LTD.; MUI LIANG TJOA (an individual); NG  
CHER YONG aka CY NG (an individual); and  
LIEW YEW SOON aka MARK LIEW (an  
individual),

Defendants.

Case No. 3:17-CV-05517-EMC

Action Filed: September 22, 2017

**DECLARATION OF JOSEPH FARRIS IN  
OPPOSITION TO PLAINTIFF'S  
SUPPLEMENTAL BRIEF IN SUPPORT OF  
MOTION IN LIMINE NO. 2**

Date: October 5, 2021

Time: 3:00 p.m.

Place: Courtroom 5, 17th Floor

**Judge: Honorable Edward M. Chen**

**Trial: November 1, 2021**

1 I, JOSEPH FARRIS, declare as follows:

2 1. I am an attorney at Arnold & Porter Kaye Scholer LLP (“Arnold & Porter”) and am  
3 licensed to practice law in California and before this Court. I am counsel of record for Defendants in  
4 this matter. I have personal knowledge of the facts stated herein, and I make this declaration in  
5 support of Defendants’ Opposition to Plaintiff’s Supplemental Brief in Support of Motion in Limine  
6 No. 2.

7 2. Attached hereto as **Exhibit A** is a true and correct excerpt from SinCo SG’s Requests  
8 for Admission to XingKe, Set Two, filed in the related State Action in the Superior Court of  
9 California, County of Santa Clara, Case No. 16-cv-301867, dated August 27, 2021.

10 3. Attached hereto as **Exhibit B** is a true and correct excerpt from SinCo SG’s Requests  
11 for Production of Documents to XingKe, Set Three, filed in the related State Action in the Superior  
12 Court of California, County of Santa Clara, Case No. 16-cv-301867, dated December 18, 2020.

13 4. Attached hereto as **Exhibit C** is a true and correct copy of an announcement from  
14 Jinlong Machinery & Electronics Co., Bates stamped SINCO2199401.

15 5. Attached hereto as **Exhibit D** is a true and correct excerpt from Jinlong Machinery &  
16 Electronics Co.’s 2019 Annual Report, Bates stamped SINCO2196850–7029.

17 I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct to the best of my knowledge.

19 Executed this 12th day of October 2021, in Castro Valley, California.

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21 /s/ Joseph Farris  
22 JOSEPH FARRIS  
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